



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

TH/EEA
F. #2014R01255

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 19, 2021

By ECF

The Honorable Allyne R. Ross
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Melendez-Rojas, et al.
Criminal Docket No. 17-434 (ARR)

Dear Judge Ross:

The government respectfully writes to request leave to file an omnibus sentencing memorandum for the defendants in the above-captioned case. The government makes this request because it anticipates that the defendants' sentencing memoranda may raise the same or similar issues, as well as similar objections to the Presentence Investigation Reports, which contain nearly-identical recitations of the relevant offense conduct. Consolidation of the government's responses will therefore avoid unnecessary duplication and inefficiency.

Counsel for defendants Jose Osvaldo Melendez-Rojas, Abel Romero-Melendez, and Francisco Melendez-Perez filed sentencing memoranda on August 6, 2021. (ECF Docket Entry Nos. 274-277.) Counsel for defendants Jose Miguel Melendez-Rojas, Rosalio Melendez-Rojas, and Fabian Reyes-Rojas have not yet submitted sentencing

